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Hearing Date: November 24, 2009
Hearing Time: 10:00 AM (EST)
Objection Deadline: November 19, 2009

*Attorneys for Irving H. Picard, Esq., Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

**NOTICE OF TRUSTEE'S MOTION FOR A PROTECTIVE ORDER
DENYING DISCOVERY SOUGHT BY LAWRENCE R. VELVEL**

PLEASE TAKE NOTICE that a hearing on the attached motion (the "Motion") will be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, on November 24,

2009 at 10:00 a.m. (EST), or as soon thereafter as counsel may be heard, at the United States Courthouse, One Bowling Green, Courtroom 623, New York, New York 10004.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the Motion shall be in writing, state with particularity the basis for the objection, and be filed with the Bankruptcy Court in accordance with General Order #462 by users of the Bankruptcy Court's case filing system, and by all other parties, on a 3.5 inch disk, with a hard copy to Chambers, and served in accordance with General Order #462 and upon: (a) Baker & Hostetler LLP, attorneys for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc Hirschfield and Amy Vanderwal; (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Kevin H. Bell, Esq., and (c) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, DC 20005, Attn: Christopher LaRosa, Esq. so as to be received no later than November 19, 2009. Any such objection shall state with specificity the reason or reasons why the relief sought in the Motion should not be granted.

Dated: New York, New York
October 30, 2009

/s/ Marc Hirschfield
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